

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Cr. No. 16-10168
v.)	VIOLATIONS:
1. VICTOR FLORENTINO, and)	18 U.S.C. § 922(a)(1)(A) --
2. ALEJANDRO OJEDA, a/k/a "Progress,")	Engaging in the Business of Dealing
Defendants.)	in Firearms without a License
)	18 U.S.C. § 2 --
)	Aiding and Abetting
)	18 U.S.C. § 924(d) and
)	28 U.S.C. § 2461(c) --
)	Criminal Forfeiture Allegation

INDICTMENT

COUNT ONE: (18 U.S.C. § 922(a)(1)(A)-- Engaging in the Business of Dealing in Firearms Without a License; 18 U.S.C. § 2 -- Aiding and Abetting)

The Grand Jury charges that:

1. From a time unknown to the Grand Jury and continuing to on or about June 8, 2016,

in Chelsea and elsewhere in the District of Massachusetts,

1. VICTOR FLORENTINO, and
2. ALEJANDRO OJEDA, a/k/a "Progress,"

defendants herein, not being a licensed importer, manufacturer and dealer under the provisions of Chapter 44 of Title 18, United States Code, did willfully engage in the business of dealing in firearms, including, but not limited to, the following:

- a. an AMT, Back Up, .9mm semi-automatic pistol, with an obliterated serial number;
- b. a Beretta, Model 84B, .380 caliber semi-automatic pistol, bearing serial number B91441Y; and

c. a JP Sauer & Sohn, .44 Magnum revolver, bearing serial number 92255.

All in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

FIREARM FORFEITURE ALLEGATION
(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

The Grand Jury further charges that:

2. Upon conviction of the offense alleged in Count One of this indictment:

1. **VICTOR FLORENTINO**, and
2. **ALEJANDRO OJEDA**, a/k/a "Progress,"

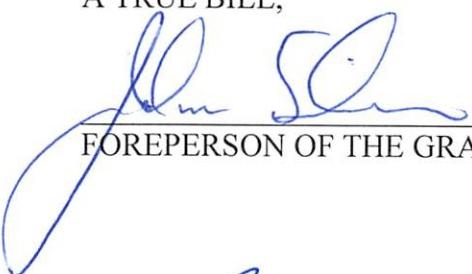
the defendants herein, shall forfeit to the United States, any firearms or ammunition involved in or used in any knowing commission of the offense, including, but not limited to the following:

- a. an AMT, Back Up, .9mm semi-automatic pistol, with an obliterated serial number;
- b. a Beretta, Model 84B, .380 caliber semi-automatic pistol, bearing serial number B91441Y; and
- c. a JP Sauer & Sohn, .44 Magnum revolver, bearing serial number 92255.

It is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the property described in paragraph 2 above.

All pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

A TRUE BILL,



FOREPERSON OF THE GRAND JURY



EMILY CUMMINGS
MICHAEL J. CROWLEY
Assistant U.S. Attorneys

DISTRICT OF MASSACHUSETTS

June 8, 2016

Returned into the District Court by the Grand Jurors and filed.

Kelleponi More 12:05pm
Deputy Clerk